

**THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**FACTORY MUTUAL INSURANCE
COMPANY, as subrogee of Agilent
Technologies, Inc.,**

Plaintiff,

v.

Case No. 2:25-cv-02424-TLP-tmp

**XPEDIENT MANAGEMENT GROUP,
LLC and ST. PAUL FIRE AND MARINE
INSURANCE COMPANY,**

JURY TRIAL DEMANDED

Defendants.

**XPEDIENT MANAGEMENT GROUP, LLC’S
MOTION TO DISMISS**

Defendant Xpedient Management Group, LLC (“Xpedient”), respectfully submits this motion to dismiss Plaintiff’s Complaint [Doc. 1] pursuant to Federal Rule 12(b)(1) and 12(b)(6).

In support, Xpedient relies on the following exhibits and its Memorandum of Authorities:

Exhibit 1—Agilent Technologies, Inc. Complaint Case No. 2:25-CV-02101-MSN-CGC

Exhibit 2—Xpedient Mgmt. Group, LLC Answer Case No. 2:25-CV-02101-MSN-CGC

WHEREFORE, Xpedient Management Group, LLC, respectfully requests Plaintiff’s Complaint be dismissed.

THIS the 14th day of May 2025.

/s/ William P. Thomas

William P. Thomas (MS 102209)

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using the Court's ECF system, which sent notification of such filing to all counsel of record.

/s/ William P. Thomas
William P. Thomas

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